

WEIL, GOTSHAL & MANGES LLP  
Richard W. Slack (*pro hac vice*)  
(richard.slack@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
David A. Taylor (#247433)  
(dtaylor@kbbkllp.com)  
Thomas B. Rupp (#278041)  
(trupp@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO TWENTY-THIRD  
SECURITIES CLAIMS OMNIBUS  
OBJECTION (SECURITIES ACQUIRED  
OUTSIDE SUBJECT PERIOD) AND  
REQUEST FOR ORDER BY DEFAULT AS  
TO UNOPPOSED OBJECTIONS**

**[Re: Dkt. No. 13956]**

**Resolving Objections Set for Hearing  
September 26, 2023 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-  
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of  
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*  
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that  
8 the Court enter an order by default on the *Reorganized Debtors’ Twenty-Third Securities Claims*  
9 *Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 13956] (the “**Twenty-**  
10 **Third Securities Claims Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE**  
12 **TWENTY-THIRD SECURITIES CLAIMS OMNIBUS OBJECTION**

13 The Twenty-Third Securities Claims Omnibus Objection seeks to disallow and expunge proofs  
14 of claim filed by Securities Claimants who do not purport to have purchased or otherwise acquired PG&E  
15 securities during the period April 29, 2015 through November 15, 2018 (the “Subject Period”) and who  
16 did not file a claim prior to the original bar date of October 21, 2019. The claims subject to the Twenty-  
17 Third Securities Claims Omnibus Objection are listed in **Exhibit 1** and **Exhibit 2** to that Objection.

18 **NOTICE AND SERVICE**

19 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Twenty-Third*  
20 *Securities Claims Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 13958]  
21 (the “**Notice of Hearing**”). The Twenty-Third Securities Claims Omnibus Objection was supported by  
22 the *Declaration of Angela Ferrante in Support of Reorganized Debtors’ Twenty-Third Securities Claims*  
23 *Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 13957] (the “**Ferrante**  
24 **Declaration**”). The Twenty-Third Securities Claims Omnibus Objection, the Notice of Hearing, and  
25 the Ferrante Declaration were served as described in the *Certificate of Service* of Victor Wong, filed on  
26 August 15, 2023 [Docket No. 13962] (the “**Certificate of Service**”). As further described in the  
27 Certificate of Service, on August 8, 2023, each holder of a claim listed on **Exhibit 1** or **Exhibit 2** to the  
28 Twenty-Third Securities Claims Omnibus Objection received a notice including the claim number,

debtor, claim amount, and the basis for the Reorganized Debtors' objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Twenty-Third Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following response:

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Anneliese Meadows	105793	Claimant contacted the Reorganized Debtors and provided information that established that Claimant traded in the Debtors' securities during the Subject Period. The Reorganized Debtors have therefore withdrawn the objection as to Claimant.

**DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- I am a member of the law firm of Weil, Gotshal & Manges LLP ("Weil"), counsel for the Reorganized Debtors.
- The Court's docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed or informally submitted to the Reorganized Debtors with respect to the Twenty-Third Securities Claims Omnibus Objection, except as described herein.

1 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and  
2 expunging the proofs of claim listed in the column headed "Claims to be Disallowed and Expunged" in  
3 **Exhibit A** to this Request, which lists the claims in **Exhibit 1** and **Exhibit 2** to the Twenty-Third  
4 Securities Claims Omnibus Objection, except as otherwise discussed above.

5 Dated September 22, 2023

6 **WEIL, GOTSHAL & MANGES LLP**

7 **KELLER BENVENUTTI KIM LLP**

8  
9 By: /s/ Richard W. Slack

10 Richard W. Slack

11  
12 *Attorneys for Debtors and Reorganized Debtors*